

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

THE GEO GROUP, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. CIV-23-1014-G
	)	
HINTON ECONOMIC	)	
DEVELOPMENT AUTHORITY, a	)	
Public Trust, and THE TOWN OF	)	
HINTON, OKLAHOMA,	)	
	)	
Defendants.	)	

**FINAL WITNESS AND EXHIBIT LIST OF  
PLAINTIFF THE GEO GROUP, INC.**

Plaintiff, The GEO Group, Inc. ("Plaintiff"), through its counsel of record, hereby submits its Final Witness and Exhibit List pursuant to the Court's Second Amended Scheduling Order (Doc. 18).

**WITNESS LIST**

No.	Name	Potential testimony	Will Call/May Call
1.	Amber Martin, Vice President The GEO Group, Inc. c/o Randall J. Wood Pierce Couch Hendrickson Baysinger & Green, LLP 1109 N. Francis Avenue Oklahoma City, OK 73106 T: 405.235.1611	Ms. Martin will testify to the terms of the Contracts existing between The GEO Group, Inc., Municipal Corrections Finance, L.P., and the Defendants. Ms. Martin will also testify to the historical flow of revenue under the Intergovernmental	Will Call

No.	Name	Potential testimony	Will Call/May Call
		Private Prison Contractor Agreement and how that revenue changed after 2021. Ms. Martin will also testify to the terms of sublease with the Oklahoma Dept. of Corrections.	
2.	Zack Frost Director, Business Management, GEO Secure Services c/o Randall J. Wood Pierce Couch Hendrickson Baysinger & Green, LLP 1109 N. Francis Avenue Oklahoma City, OK 73106 T: 405.235.1611	Mr. Frost will testify to the flow of revenue under the current sublease with the Oklahoma Dept. of Corrections and to the manner of operations of the Great Plains Correctional Facility under the 2023 sublease.	Will Call
3.	All witnesses listed by Defendants and not objected to by Plaintiff.		May Call
4.	Custodians of records or any witness necessary to authenticate a document or exhibit.		May Call

### **EXHIBIT LIST**

No.	Document
1.	Warranty Deed dated December 29, 1999, conveying property from Cornell Corrections of Oklahoma, Inc. to Hinton Economic Development Authority.
2.	Lease Agreement entered into as of December 31, 1999.
3.	Intergovernmental and Private Prison Contractor Agreement dated as of March 1, 2000.
4.	Sublease dated April 18, 2023, between Municipal Corrections Finance, LP and The Oklahoma Department of Corrections.
5.	Demands for payment from the Defendants to the Plaintiff.
6.	Assignment and Assumption of Lease dated August 14, 2001.

7.	Amendment to Intergovernmental and Private Prison Contractor Agreement.
8.	Second Amended and Restated Amendment to Intergovernmental and Private Prison Contractor Agreement.
9.	Defendants' Response to Plaintiff's First Set of Discovery Requests.
10.	All exhibits listed by Defendant not otherwise objected to by Plaintiff.
11.	All exhibits attached to depositions or produced through discovery and/or subpoenas not otherwise objected to by Plaintiff.

Plaintiff reserves the right to amend this Witness and Exhibit list as discovery is ongoing.

Respectfully submitted,

s/ Randall J. Wood  
Robert S. Lafferrandre, OBA #11897  
Randall J. Wood, OBA #10531  
Jessica James Curtis, OBA #35140  
PIERCE COUCH HENDRICKSON  
BAYSINGER & GREEN, L.L.P.  
1109 N. Francis Avenue  
Oklahoma City, OK 73106  
Telephone: (405) 235-1611  
Facsimile: (405) 235-2904  
[rlafferrandre@piercecouch.com](mailto:rlafferrandre@piercecouch.com)  
[rwood@piercecouch.com](mailto:rwood@piercecouch.com)  
[jjamescurtis@piercecouch.com](mailto:jjamescurtis@piercecouch.com)  
***Attorneys for Plaintiff, The GEO  
Group, Inc.***

**CERTIFICATE OF SERVICE**

I hereby certify that on this **6<sup>th</sup> day of August, 2024**, I electronically transmitted the attached document to the Clerk of Court via the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to all parties that have filed an Entry of Appearance in this matter.

s/ Randall J. Wood \_\_\_\_\_  
Randall J. Wood